



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
1235 Mission Street
San Francisco, CA 94103

20 SEP 1990

GENERAL NOTICE LETTER AND INFORMATION REQUEST
URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

American Sheds Incorporated
P.O. Box 3151
Houston, Texas 77253

Re: San Gabriel Valley Superfund Sites, Areas 1-4
San Gabriel, California

Dear Sirs:

NOTICE OF POTENTIAL LIABILITY

This letter notifies you of potential liability, as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9607(a), as amended ("CERCLA"), that you may incur or may have incurred with respect to the San Gabriel Valley superfund sites ("Sites"). This letter also notifies you of potential response activities at the Sites which you may be asked to perform or finance at a later date.

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the Sites. EPA has spent, or is considering spending, public funds on actions at the Sites. Unless EPA reaches an agreement under which a potentially liable party or parties ("PRPs") will properly perform or finance such actions, EPA may perform these actions pursuant to CERCLA § 104.

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6973, as amended ("RCRA"), and other laws, PRPs may be obligated to implement response actions deemed necessary by EPA to protect the public health welfare or the environment and may be liable for all costs incurred by the government in responding to any release or threatened release at the Sites. Such actions and costs may include, but are not limited to, expenditures for conducting a Remedial Investigation and Feasibility Study ("RI/FS"), a Remedial Design and Remedial Action

("RD/RA") and other investigation, planning response and enforcement activities.

EPA has evaluated information in connection with the investigation of the Sites concerning persons who may be associated with it. Based on this evidence, EPA believes that you may be a PRP with respect to the Sites. PRPs under CERCLA include current and former owners and operators of property at the Sites, person who arranged for the disposal of hazardous substances found at the Sites, or persons who accepted hazardous substances for transport to the Sites. By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you to voluntarily perform or finance those response activities that EPA determines are necessary at the Sites.

In accordance with CERCLA and other authorities, EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Sites. EPA may expend additional funds for response activities at the Sites under the authority of CERCLA and other laws.

SITE RESPONSE ACTIVITIES

At present, EPA is planning to conduct, or has already conducted, the following activities at the Sites:

1. Remedial investigations of sources of contamination and the extent of soil and ground water contamination at or in proximity to your facility and throughout the Sites.
2. Feasibility study of remedial alternatives.
3. RD/RA to design and implement the remedial action(s) selected and approved by EPA for the Sites.
4. Follow-through activities to operate, maintain, and monitor the completed remedial action(s) as required at the Sites after completion of the remedial design and action.

With regard to (1) above, pursuant to Section 3013 of RCRA, 42 U.S.C. § 6934, and/or Sections 104 and 106 of CERCLA, 42 U.S.C. §§ 9604 and 9606, PRPs at the Sites are responsible for investigations and remedial actions concerning not only releases or threatened releases of hazardous substances from their own facilities, but also the area wide ground water contamination. EPA has specific authority under CERCLA to require PRPs to conduct investigations and provide information regarding releases or threatened releases of hazardous substances. EPA is currently in the process of gathering such information and to that end, has included an information request along with this letter.

In the event that contamination is continuing to spread due to a release from your facility, EPA believes that it would be prudent to initiate and complete these investigations as soon as possible. EPA encourages you to enter into an agreement with EPA regarding this work. If you decide to independently undertake any such investigations you should follow appropriate EPA guidances and regulations with regard to sampling, analysis, chain-of-custody, quality assurance/quality control and date validation in order to assure the validity of such data and to ensure that any work performed or costs expended will be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, April 9, 1990 ("NCP"). These guidances and regulations include, but are not limited to the RI/FS Guidances and the RCRA Facility Investigation Guidance. Failure to follow appropriate guidance may result in any data, results or reports generated by such an investigation being unacceptable to EPA. EPA is willing to make available appropriate guidances and regulations and if you wish, to meet with you and/or your consultants to discuss an investigation as described in this section.

SPECIAL NOTICE AND NEGOTIATION MORATORIUM

You may receive an additional EPA notice in the future. That notice will inform you that EPA is using the CERCLA Section 122(e) "Special Notice" procedures to formally negotiate terms of a consent agreement to conduct or finance site response activities or it will inform you that EPA is not using this procedure. If EPA does not use the Special Notice procedures set forth in CERCLA § 122(e), the notice will specify that Special Notice was inappropriate in this case.

Under Section 122(e), EPA has the discretionary authority to use the Special Notice procedures if EPA determines that such procedures would facilitate an agreement between EPA and the PRPs and would expedite remedial action at the Sites. Use of the Special Notice procedures triggers a moratorium on certain EPA activities at the Sites. The purpose of the moratorium is to provide a period of time when PRPs and EPA may enter into formal negotiations for PRP conduct or financing of the response activities at the Sites.

Presently EPA anticipates issuing Special Notice for conducting the RI/FS at the portion of the Sites in proximity to the Aerojet facility in the autumn months. The moratorium for RI/FS negotiations lasts for 60 days after the Special Notice is received by the PRP. If a good faith offer is submitted by the PRPS within those 60 days, another 30 days are automatically provided for further negotiations.

If EPA determines that a good faith offer has not been submitted within the first 60 days of the moratorium period, EPA may terminate the negotiation period under CERCLA § 122(e)(4). EPA is then authorized to commence such clean-up or enforcement

actions as it deems appropriate. In the absence of an agreement with the PRPs to perform or finance the necessary clean-up activities, EPA may undertake these activities and pursue cost reimbursement from the PRPs.

REQUEST FOR INFORMATION

Attached to this letter is an information request issued pursuant to Section 104(e) of CERCLA and Section 3007 of RCRA. Full compliance with this request is mandatory. Section 104(e) of CERCLA and Section 3007 of RCRA permit EPA to seek the imposition of penalties of up to twenty-five thousand (\$25,000) for each day of non-compliance. You should contact EPA within five (5) working days of your receipt of this letter if you wish to discuss the Request for Information.

INFORMATION TO ASSIST RESPONSIBLE PARTIES

EPA would like to encourage good faith negotiations between the PRPs and EPA. To assist the PRPs in preparing a proposal and in negotiating with EPA concerning this matter, EPA is providing the following information as an attachment to this letter:

1. A list of names and addresses of PRPs to whom this notification is being or has been sent. This list represents EPA's preliminary findings on the identities of PRPs. Inclusion on, or exclusion from, this list does not constitute a final determination by EPA concerning the liability of any party for the release or threatened release of hazardous substances at the Sites. EPA may update this list at any time. You may wish to contact EPA periodically to inquire about any such update and to receive an updated list.

PRP STEERING COMMITTEE

EPA recommends that all PRPs meet to select a steering committee responsible for representing the groups interests. Establishing a manageable group is essential for successful negotiations with EPA. Alternatively, EPA encourages all PRPs to select one person from their company or organization who will represent their interests.

ADMINISTRATIVE RECORD

Pursuant to Section 113(k) of CERCLA, EPA has established an administrative record file that contains documents that will form the basis of EPA's decision on the selection of a response action(s) for the Sites. This administrative record is open to the public for inspection and comment.

In addition, when the San Gabriel Valley Superfund Project

began, EPA established eleven (11) information repositories at various locations around the San Gabriel Valley. These eleven (11) repositories have been divided into four (4) primary and seven (7) secondary repositories. The primary repositories contain a comprehensive collection of public documents prepared for the project. The secondary repositories contain fact sheets and those documents specifically relevant to the community where the repository is located.

The primary repositories are:

1. Baldwin Park Public Library
4181 Baldwin Park Blvd.
Baldwin Park, CA 91706
(818) 962-6947
2. Upper San Gabriel Valley Municipal Water District
11310 East Valley Blvd.
El Monte, CA 91731
(818) 443-2297
3. La Puente City Library
15920 East Central Ave.
La Puente, CA 91744
(818) 968-4613
4. Water Resources Center Archives
University of California - Los Angeles
2081 Engineering I
Los Angeles, CA 90024
(213) 825-7734

The secondary repositories are:

1. Alhambra City Library
410 West Main Street
Alhambra, CA 91801
(818) 570-5008
2. San Gabriel Valley Municipal Water District
549 East Sierra Madre Blvd.
Azusa, CA 91702
(818) 969-7911
3. El Monte Library
3224 North Tyler Avenue
El Monte, CA 91731
(818) 444-9506
4. West Covina Public Library
1601 West Covina Parkway
West Covina, CA 91790
(818) 962-3541
5. Hacienda Heights Public Library
16010 La Monde Street
Hacienda Heights, CA 91745
(818) 968-9356
6. Whittier Central Public Library
7344 South Washington Street
Whittier, CA 90602
(213) 698-8949
7. Norwood Public Library
4550 North Peck Road
El Monte, CA 91732
(818) 443-3147

PRP RESPONSE AND EPA CONTACT

You should notify EPA in writing within thirty (30) days of your receipt of this letter of your willingness to conduct or finance response activities at the Sites and to participate in possible future negotiations. If you are a member of a steering committee you may respond to this letter through your steering committee. If EPA does not receive a timely response, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the response activities at the Sites, and that you have declined any involvement in performing the response activities. You may be held liable by EPA under Section 107 of CERCLA for the cost of the clean-up activities EPA performs at the Sites.

In your response to this letter, please indicate the


appropriate name, address, and telephone number for further contact. If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action, or will be involved in a lawsuit regarding this Sites, you should continue such activities as appropriate. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter, and to provide a copy of the response to any other parties involved in those discussions or actions.

Your response to this letter should be sent to:

Glenn Kistner
South Coast Groundwater Section H-6-4
United States Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

If you or your attorney have any legal questions pertaining to this matter, please direct such questions to Mark Klaiman, Assistant Regional Counsel at (415) 556-5846.

Sincerely yours,


Jerry Clifford, Deputy Director
Superfund Programs

Attachments

cc: Robert Ghirelli, Executive Officer
Los Angeles Regional Water Quality Control Board

Glenn Kistner, South Coast Groundwater Section H-6-4

Mark J. Klaiman, Assistant Regional Counsel

ATTACHMENT I

RECIPIENTS OF GENERAL NOTICE OF LIABILITY FOR THE SAN GABRIEL
VALLEY SUPERFUND SITES, AREAS 1-4

CURRENT AND FORMER AEROJET ELECTROSYSTEMS PROPERTY

Al Pyke
A & J Systems
1236 S. Soderberg
Glendora, California 91740

Robert Richards
Aerojet Electrosystems
1100 W. Hollywood Blvd.
Azusa, California 91702

Roger I. Ramseir
Aerojet General Corporation
100 Blue Ravin Rd.
Folsom, California 95630

Michael Serrara
Branch Manager
Allied Photo Products Inc.
16018-D Adelante Street
Irwindale, California 91702

Wayne E. Hedien
Allstate Insurance Company
Allstate Plaza
Northbrook, Illinois 60062

American Sheds Incorporated
P.O. Box 3151
Houston, Texas 77253

Arcadia Machine and Tool
6226 Santo Diaz St.
Irwindale, California 91706

Irene Burns
Associated Asphalt Paving Materials
1313 W. Gladstone St.
Azusa, California 91702

Tom Sheedy
Azusa Rock Inc.
3901 Fish Canyon Rd.
Azusa, California 91702

Richard Spencer
Azusa Land Reclamation
P.O. Box 949
Azusa, California 91702

Mike Gatherer
B&B Red-I-Mix Concrete Inc.
590 Live Oak Ave.
Irwindale, California 91706

Anthony Brent
Brent Family Trust
506 North Elm Drive
Beverly Hills, California 90210

Skip Wilcox
C&H Distributing
16014A Adelante St.
Irwindale, California 91702

Fredrich Gerstell
Cal Mat Company
Conrock Division
3200 San Fernando Rd.
Los Angeles, California 90065

Robert K. Best
Caltrans
1120 N. Street
Sacramento, California 95814

William Mitzel
Chemical Waste Management Company
107 South Motor
Azusa, California 91702

Mike Shannon
Chemlawn Service Corp.
16022 Adelante St.
Irwindale, California 91706

Kenneth T. Derr
Chevron Corporation
225 Bush St.
San Francisco, California 94120

Cleanweld Products Inc.
16016 Montoya St.
Irwindale, California 91702

Crow-Eaves-Nesbit No. 2
2 North Lake Avenue, Suite 650
Pasadena, California 91101

James Frazen
Davis Walker Corporation.
6315 Bandini Blvd.
Los Angeles, California 90040

Jim Pearsall
Davis Walker Corporation.
5555 N. Irwindale Ave.
Irwindale, California 91705

Benson Davies
Davies Realty
786 Third Avenue, Suite A
Chula Vista, California 92010

Day & Night Manufacturing
700 Royal Oak Ave
Monrovia, California 91016

Leslie Varghese
Day & Night Manufacturing
855 Anaheim-Puente Road
City of Industry, California 91749

Richard Smith
Food Engineering Service
16015 Adelante Street
Irwindale, California 91702

Ken Walton
GAF Building Materials Corporation
6230 Irwindale Ave.
Irwindale, California 91706

Robert Richards
GENCORP Inc.
1100 W. Hollyvale
Azusa, California 91702

Dave Grattan and Sons
16135 Montoya Street
Irwindale, California 91706

Jack Harris
6360 Irwindale Avenue
Irwindale, California 91706

Brett Parks
General Manager
Howard Custom Boats
16009 Montoya Street
Irwindale, California 91706

Harry Sanford
Irwindale Arms Inc.
6226 Santo Diaz Street
Irwindale, California 91702

Kenneth Rainin
Ioptex Inc.
1301 Optical Dr.
Azusa, California 91702

Kenneth Rainin
Ioptex Inc.
6232 Santo Diaz St.
Irwindale, California 91706

Alfred Herrera
Irwindale Community Redevelopment Agency
5050 Irwindale Blvd.
Irwindale, California 91706

J and L Investments
8380 Melrose Avenue, Number 304
Los Angeles, California 90069

Jerry Nelson
Johnston Pump/General Valve, Inc.
5215 Producer Way
Pomona, California 91768

Toni Delliquandri
Los Angeles County Tax Collector
225 North Hill
Los Angeles, California 90012

John W. Lucas
Lucas Specialty Rock & Sand Co.
11105 Redwood Ave.
Fontana, California 92335

Richard Emerson
Mag Parts
1545 W. Roosevelt
Azusa, California 92702

Val Major
Major Partitions Inc.
16019 Adelante
Irwindale, California 92702

Major Trust and M & G Investment
P.O. Box 2167
Irwindale, California 91706

R. A. Cartledge
McFarling Glass
1316 National City Blvd.
National City, California 92050

Merritt Investment Company
2027 Yacht Defender
Newport Beach, California 92660

Tibor and Maria Nagy
Ole and Lillie Mouritzen
24143 Willow Creek
Diamond Bar, California 91765

William & Edith Neiman
1164 Amalfi Drive
Pacific Palisades, California 90272

Phillip England
Optical Radiation Corporation
1300 Optical Dr.
Azusa, California 91702

Gary Hodgson
Oro Valves Inc.
16103 Montoya St.
Azusa, California 91702

Phaostron Instruement & Electronic Company
717 North Coney Avenue
Azusa, California 91702

Beverly Clark
Manager
Poly West Corporation
16018-C Adelante Street
Irwindale, California 91702

John Digildo
Branch Manager
Printers Service
16014-D Adelante Street
Irwindale, California 91702

John Cramer
Reichold Chemical Inc.
237 S. Motor Ave.
Azusa, California 91702

E. Rodeffer and D. Butler
P.O. Box 2460
Newport Beach, California

G. Macphers
River Ryan Partnership
17691 Mitchell N.
Irvine, California 92714

Don Brinkman
Safety Kleen
10625 Hickson St.
El Monte, California 91731

Raymond Delrich
Sales & Staff Development, Inc.
5757 West Century Blvd., Number 512
Los Angeles, California 90045

Harry W. and Nadine H. Sanford
2171 Highland Oaks
Arcadia, California 91004

Santos Diaz Street Partnership
230 North Maryland Avenue, Suite 202
Glendale, California 91206

Andrea Pagano
Select Copy Systems of Southern California
6229 Santo Diaz St.
Irwindale, California 91706

E. Lee Smith III
W.W. Smith Trust
17612 Orange Tree Lane
Tustin, California 92680

Staff Investment Company II
1010 South Catalina Avenue, B
Redondo Beach, California 90277

Richard Chamberlain
Southdown Inc.
1201 W. Gladstone
Azusa, California 91702

W.J. Conway
Southwestern Portland Cement Company
100 N. Barranca
West Covina, California 91791

Edward Morris
Structural Composites Industrial Inc.
325 Enterprise Place
Pomona, California 91768

Ralph Beatty
Transmix Corporation
9961 Valencia St.
Laguna Beach, California 92653

Tibor Nagay
Trimex Corporation
16006 Montoya Street
Irwindale, California 91706

Richard Solverstone
Wholesale Products Corporation
of America
2957 E 46th St.
Los Angeles, California 90058

Landrum and Margaret Wilkerson
1915 Calafia Street
Glendale, California 91208

Eradio T. Jimenez
Wynn Oil Company
1050 West 5th Street
Box 4370
Fullerton, California 92634

BASINWIDE

Ian Wilcox
A&E Plastics Co.
14505 E. Proctor Ave.
City of Industry, California 91749

Donald Morris
Acorn Engineering Co.
15125 Proctor Ave.
City of Industry, California 91749

Cort Bowman
Acromil
18421 Railroad St.
City of Industry, California 91748

Robert Ludlam
Adams Campbell Company Ltd.
15343 Proctor Ave
City of Industry, California 91749

Ross McCallum
Air Distribution Products, Inc.
9733 Klingerman St.
S. El Monte, California 91733

William Belzberg
Ajax/Scouville, Inc.
First City Properties, Inc.
8383 Wilshire Blvd. Ste.800
Beverly Hills, California 90211

Mona Sue Art
Artistic Polishing and Plating
9751 Klingerman St.
South El Monte, California 91733

Rogger Hammer
Astro Seal, Inc.
9452 Rush St.
South El Monte, California 91733

Gladys McKensie
Ball-Icon, Ball Glass Div.
4000 Arden Drive
El Monte, California 91731

James Norman
BDP Company
855 Anaheim-Puente Rd.
City of Industry, California 91749
James Norman

Frank Hintze
Benchmark Technology
200 Turnbull Canyon Rd.
City of Industry, California 91745

James Mueller
Brown Jordan Co.
9860 Gidley St.
El Monte, California 91731

Marvin Ekseron
Cardinal Industries Finishers
1329 Potrero Ave.
South El Monte, California 91733

Robert L. Coombes, Sr.
Crown City Plating Co.
4350 Temple City Blvd.
El Monte, California 91731

James Hawkins
Dandy Engine Supply
11346 Stewart St.
El Monte, California 91732

James Hawkins
Dandy Engine Supply
13505 San Antonio Drive, Suite H
Norwalk, California 90650

Francisco Burtamente Cazares
Dandy Engine Supply
3203 Frazier Street
Baldwin Park, California 91706

Harry Gantz
DuBois Chemicals
15010 E. Don Julian Rd.
City of Industry, California 91746

Clifford Christ
Gould Inc. Navcom Systems Div.
4323 Arden Drive
El Monte, California 91731

Leon Wilton
Gun Drilling Specialties, Inc.
2632 Loma Ave.
South El Monte, California 91733

William Nosil
Hexcel Corp. Mic Div.
140 N. Orange
City of Industry, California 91744

Colin Wigglesworth
Hysol Div., The Dexter Corp.
15051 E. Don Julian Rd.
City of Industry, California 91746

Robert Bozung
J. A. Bozung Co.
9401 Whitmore St.
El Monte, California 91732

Louis Korbe
Los Angeles Die Mold
1942 N. Rosemead Blvd.
S. El Monte, California 91733

Mark Hamilton
Lucas (formerly Western Gear)
14724 E. Proctor Ave.
City of Industry, California 91749

C. R. Alexander
MacLanburg-Duncan
15257 Proctor Ave.
City of Industry, California 91749

Douglas Allstun
Manufacturer's Service, Inc.
2210 N. Chico Ave.
South El Monte, California 91733

Edsel Dunford
Monadnock Co.
c/o: TRW, Inc.
One Space Park
Redondo Beach, California 90278

James Bolotin
Multi-Chemical Products
2128 200 Merced Ave.
South El Monte, California 91733

Palmer Battery
3013 Potrero Ave.
South El Monte, California 91733

Richard D'Epitano
Palmer Battery
Superior Discount Auto Parts
3740 Florence Street
City of Bell, California 90201

Noel Reuland
Reuland Electric Co.
17969 E. Railroad St.
City of Industry, California 91749

John Adams
Sparling
4097 Temple City Blvd.
El Monte, California 91731

Lloyd Gomez
Spectrol Electronics
17070 E. Gale Ave.
City of Industry, California 91745

Dr. Edward Aqua
Stoody Company
16425 Gale Ave.
City of Industry, California 91745

William Peters
Trail Chemical
9904 Gidley St.
El Monte, California 91731-1186

Barry Zwahlen
2223 Loma Ave.
South El Monte, California 91733

ATTACHMENT II

REQUEST FOR INFORMATION PURSUANT TO SECTION 104 OF CERCLA AND SECTION 3007 OF RCRA

The EPA is conducting an investigation of soil and groundwater contamination or threatened contamination resulting from the release or threatened release of hazardous wastes and/or substances in the San Gabriel Valley. The purpose of this investigation is to determine the nature, cause, and extent of the release of hazardous substances in the area, and to determine the source or sources of such releases, to assess the effects of any contamination on the environment and public health, to determine the details and evaluate to adequacy of any remedial actions that have been planned or initiated to date, and to determine what future response actions are needed to abate the release of such substances to the environment.

As part of this investigation, EPA needs historical and present information from companies currently or previously located near the area of known or suspected contamination. EPA has reason to believe that you may be in possession of such information. Therefore, pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. § 9604, and Section 3307 of RCRA, 42 U.S.C. § 6972, you are hereby requested to respond to the Information Request set forth herein.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully within thirty (30) days of receipt, or to adequately justify such failure to respond, can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA and Section 3008 of RCRA. Each of these statutes permit EPA to seek imposition of penalties up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties un 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

You must respond the following Information Request by letter, signed by you or a duly authorized official, submitted to the following office with thirty (30) days of your receipt of this Request:

Glenn Kistner
South Coast Groundwater Section H-6-4
United States Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

If you need further information concerning technical issues, please contact Glenn Kistner at (415) 744-1890. If you have any legal questions please contact Mark Klaiman, Assistant Regional Counsel, at (415) 556-5846.

INFORMATION REQUEST

Instructions

1. A separate response must be made to each of the Questions set forth in this Information Request.
2. Precede each answer with the number of the question to which it corresponds.
3. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of this response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. For each and every Question contained herein, identify the person(s) answering these Questions on behalf of Respondent.
6. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
7. For each and every Question contained herein, identify all persons, including Respondent's employees, who have knowledge or information about the subject matter of the Question.
8. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
9. For each and every Question contained herein, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any Questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
10. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody, or control, then identify the persons from whom such information may be obtained.
11. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information

requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, as amended by SARA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or some other suitable form of notice employing language such as "trade secret", "proprietary", or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

12. Where specific information has not been memorialized in any document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, unincorporated association, partnership, corporation, trust or other entity.
3. The terms "the Site" or "the facility" shall mean and include the property indicated as Book 8615, Page 1, Block 0, Parcel 27, Lot 30, and/or Book 8615, Page 1, Block 0, Parcel 27, Lot 46 in the Local Assessment Roll of Property in the County of Los Angeles, California, commonly known as 1001 West First Street, Azusa, California, or any other property on or about, or approximately bounded by, Irwindale Avenue on the West; Interstate 210 on the North; Aspen Avenue on the East; and First Street on the South, in Azusa and Irwindale California.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA and includes any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances, including petroleum products.

6. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
7. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to all hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes, as defined above.
9. The term "hazardous material" shall mean all hazardous substances, pollutants, contaminants, and hazardous wastes, as defined above.
10. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
11. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
12. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
13. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or subject matter.
14. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
15. The term "document" and "documents" shall include writing of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like,

diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

16. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

17. The term "arrangement" means every separate contract or other agreement between two or more persons.

18. The term "property interest" means any interest in property, including but not limited to, any ownership interest, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.

19. The term "asset" shall include the following: real estate, buildings or other improvements to real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations and unincorporated companies, securities, patents, stocks, bonds, and other tangible as well as intangible property.

Questions

1. List the EPA RCRA Identification Numbers of the Respondent, if any.

2. Describe any acts or omissions of any persons, other than your employees, agents, or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Site and damages relating therefrom

and identify such persons. In addition:

a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties, and the consequence that could foreseeably result from such acts or omissions.

b. Describe the care you exercised with respect to the hazardous substances found at the Site.

3. Identify the current owner. State the dates during which the current owner owned, operated, or leased any portion of the Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

4. Describe the physical characteristics of the Site, including but not limited to, the following:

a. Surface structures (e.g., building, tanks, etc),

b. Subsurface structures (e.g., underground tanks, sumps, etc.),

c. Ground water wells and dry wells, including drilling logs,

d. Past and present storm water drainage system, sanitary sewer system, including septic tank(s) and subsurface disposal field(s), and

e. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Site, or to the property itself (e.g., excavation work) and state the dates on which such changes occurred.

5. Identify all prior owners of the Site. For each prior owner further identify:

a. The dates of their ownership, and

b. All evidence that hazardous materials were released or threatened to be released at the Site during the period that they owned the Site.

6. Identify the prior operators and lessees of the Site. For each such operator or lessee, further identify:

a. The dates of their operations at, or lease of, the Site,

b. The nature of their operations at the Site, and

c. All evidence that hazardous materials were released or threatened to be released at the Site during the period in which

they were operating at the Site.

7. Provide all existing technical or analytical information about the Site, including, but not limited to, data and documents related to soil, water (ground and surface), geology, hydrogeology, or air quality on and about the Site.

8. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrogeology, or air quality on or about the Site? If so, identify:

a. What the nature and scope of these investigations will be,

b. The contractors or other persons that will undertake these investigations,

c. The purpose of the investigations,

d. The dates when such investigations will take place and be completed, and

e. Where on the Site such investigations will take place.

9. Did you acquire the Site after the disposal or placement of the hazardous substances on, in, or at the Site? Describe all of the facts on which you base the answer to this Question.

10. At the time you acquired the Site, did you know or have reason to know that any hazardous substance was disposed of on, in, or at the facility? Describe all investigations of the Site that you took prior to acquiring the Site, and all of the facts on which you base the answer to this Question.

11. Did you ever transport to the Site or use, purchase, generate, store, treat, dispose, or otherwise handle at the Site any materials? If the answer to this question is anything but an unqualified "no", identify:

a. In general terms, the nature and quantity of the non-hazardous materials so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled,

b. The chemical composition, characteristics, physical state (e.g., solid, liquid, gas) of each hazardous material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled,

c. The persons who supplied you with each such hazardous material,

d. How each such hazardous material was transported, used,

purchased, generated, stored, treated, disposed, or otherwise handled by you,

e. When each such hazardous material was transported, used, purchased, generated, stored, treated, disposed, or otherwise handled by you,

f. Where each such hazardous material was used, purchased, generated, stored, treated, disposed, or otherwise handled by you, describe the location(s) and provide a map or diagram of such location(s) and,

g. The quantity of each such hazardous material used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.

12. Identify all leaks, spills, or releases or threats or releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the Site. In addition, identify:

a. When such releases occurred or may occur,

b. How the releases occurred or may occur,

c. What hazardous materials were released or may be released,

d. What amount of each such hazardous material was so released,

e. Where such releases occurred or may occur, describe the location(s) and provide a map or diagram of such location(s),

f. Any and all activities undertaken in response to each such release or threatened release,

g. Any and all investigations of the circumstances, nature, extent, or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken,

h. Whether any report(s) of any such release(s) was (were) made to any public agency, and the content of that (those) report(s),

i. All persons with information relating to subparts a. through h. of this Question.

13. If any releases or threatened release identified in response to Question 12, above, occurred into any subsurface disposal system, floor drain, sump, or dry well inside or under any buildings located on the Site, further identify:

- a. Precisely where the disposal system, floor drain, sump, or dry well is and was located,
- b. When the disposal system, floor drain, sump, or dry well was installed,
- c. Whether the disposal system, floor drain, sump, or dry well was connected to pipes,
- d. Where such pipes are or were located, describe the location(s) and provide a map or diagram of such location(s)
- e. When such pipes were installed, and
- f. How and when such pipes were replaced, repaired, or otherwise changed.

14. Identify all liability insurance policies held by Respondent from the time Respondent began operations at, or assumed ownership of (whichever occurred earlier), the Site until the present. In identifying such policies, state:

- a. The name and address of each insurer and of the insured,
- b. The amount of coverage under each policy,
- c. The commencement and expiration dates for each policy,
- d. Whether or not the policy contains (or contained) a "pollution exclusion" clause, and
- e. Whether or not the policy covers (or covered) sudden, nonsudden, or both types of accidents.

In lieu of providing the information requested in subparts a. through e. of this Question, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials.

15. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

16. Provide all financial statements for the past five fiscal years, including, but not limited to, those filed with the federal and state Internal Revenue Service and Securities and Exchange Commission.

17. Identify all of Respondent's current assets and liabilities and the person(s) who currently own or are responsible for such assets and liabilities.

18. Identify all subsidiaries and parent corporations of Respondent.

19. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.

20. Identify the managers and majority shareholders of Respondent and the nature of their management duties or amount of shares held, respectively.

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
(Extra charge) (Extra charge)

3. Article Addressed to:
AMERICA SHEDS INCORPORATED
P.O. BOX 3151
HOUSTON, TEXAS 77253

4. Article Number
P 553-882-815

Type of Service:

- | | |
|---------------------------------------|--|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt
for Merchandise |

Always obtain signature of addressee
or agent and DATE DELIVERED.

5. Signature — Address

X

6. Signature — Agent

X

Allen Harris

7. Date of Delivery

SEP 25 1990

8. Addressee's Address (*ONLY if
requested and fee paid*)

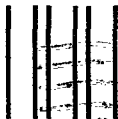
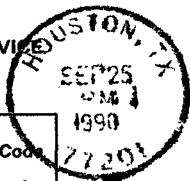
UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN

TO



Print Sender's name, address, and ZIP Code in the space below.

GLENN KISTNER, H-6-4

U.S. EPA, REGION IX, HWMD

1235 MISSION STREET

SAN FRANCISCO, CA 94103